



HEALTH AFFAIRS



TRICARE
Management
Activity

Privacy/Security Officer Reporting Proposal

HIPAA Training: 2005 Summer Sessions

TMA Privacy Office

*This document contains proprietary information and will be handled within Government regulations.
It is intended solely for the use and information of the Military Health System.*

Training Objectives

- Upon completion of this course, you should be able to:
 - Describe the proposed reporting plan
 - Describe the proposed metrics plan
 - Understand the future initiatives

Agenda

- Reporting Plan
- Metrics
- Training Compliance
- PHIMT Compliance
- HIPAA BASICS™ Compliance
- Future initiatives

Proposed Reporting Requirements

Reporting Plan (1 of 4)

- Reports will be from multiple levels of the organization
 - TRICARE Health Plan (MHS)
 - Includes TMA, Army, Navy, Air Force, and the Coast Guard
 - Results will be provided to ASD(HA)
 - Service Medical Components/TMA
 - Included entities are at the discretion of the Services and TRICARE
 - Results of the reports to be provided from the MHS on a monthly, quarterly, or annual basis or as requested
 - Military Treatment Facilities
 - Includes clinics and satellite facilities

Proposed Reporting Requirements

Reporting Plan (2 of 4)

- Compliance Model
 - Commander directs the performance of the Risk Assessment based on standards and implementation specifications
 - Security Officer will assign a quantitative score to standards and implementation specifications based on results of Risk Assessment

	HIGH		MEDIUM		LOW
Score	1	2	3	4	5
Standards			X		
Implementation Specifications				X	

- Score will determine frequency of reporting
 - Score of 1 or 2 requires monthly reporting; High priority
 - Score of 3 or 4 requires quarterly reporting; Medium priority
 - Score of 5 requires annual reporting; Low priority
- As facility addresses areas of risk, score will be adjusted and reporting frequency will decline or increase

Proposed Reporting Requirements

Reporting Plan (3 of 4)

- Privacy and Security Tool Reports
 - LMS Reports
 - Training compliance
 - HIPAA BASICS™ reports
- Privacy Specific Reports
 - PHIMT Report
 - Complaints Report
 - Number of complaints
 - Types and nature of complaints
 - Use or disclosure
 - Minimum necessary issues
 - Training
 - Violations

Proposed Reporting Requirements

Reporting Plan (4 of 4)

- Security Specific Reports
 - Security Officer Turnover Report
 - OCTAVESM Completion Report
 - Incident Report
 - Complaints Report
 - Number of complaints
 - Types and nature of complaints
 - Access management issues
 - Training
 - Violations

Proposed Reporting Requirements

Metrics

- Security and Privacy goals are met by the integration of people, processes, procedures, and tools
 - Relying on too few indicators may inflate or deflate the measure of compliance
 - Additional metrics of HIPAA effectiveness required to measure various aspects of organization
- HIPAA Security and Privacy metrics and corresponding methodology
 - Gauge ongoing management of and processes supporting HIPAA requirements
 - Establish basis for review of compliance by external groups
 - JCAHO
 - GAO
 - IG

Proposed Reporting Requirements

Training Compliance Report

- Percentage of staff training (core training)
 - Greater than 30 days delinquent
 - 60 days delinquent
 - 90 days delinquent
- Percentage by job category complete (annual refresher)
 - Greater than 30 days delinquent
 - 60 days delinquent
 - 90 days delinquent
- Dates and attendance numbers for local policies and procedures training
 - Percentage of staff completed

Proposed Reporting Requirements

LMS Training Report

- Each MTF will be asked to provide a monthly training status report including:
 - # of accounts at facility
 - # of accounts established in report month
 - # of accounts made inactive
 - # of 30/60/90 days delinquent
 - # of personnel deployed

Privacy and Security Officer Transition Requirements

LMS Training Report

- Note “Deployed” and “Delinquent” numbers

Pass Percentage for Job Positions

Summary

No. of Students:	25	No. Of Students Deployed:	3
No. of Students Complete:	5	:	
No. of Students Incomplete:	20	:	
Percentage of Students Complete:	20%	:	
Students 31-60 Days Delinquent:	2	Deployed Students 31-60 Days Delinquent:	1
Students 61-90 Days Delinquent:	0	Deployed Students 61-90 Days Delinquent:	0
Students 90+ Days Delinquent:	12	Deployed Students 90+ Days Delinquent:	2

Proposed Reporting Requirements

Training Compliance: Service Numbers

Organization	Total # of Students	Students Complete
Air Force	45,917	78.69%
Army	70,087	91.20%
Navy	47,016	81.27%
Coast Guard	1164	71.90%

Proposed Reporting Requirements

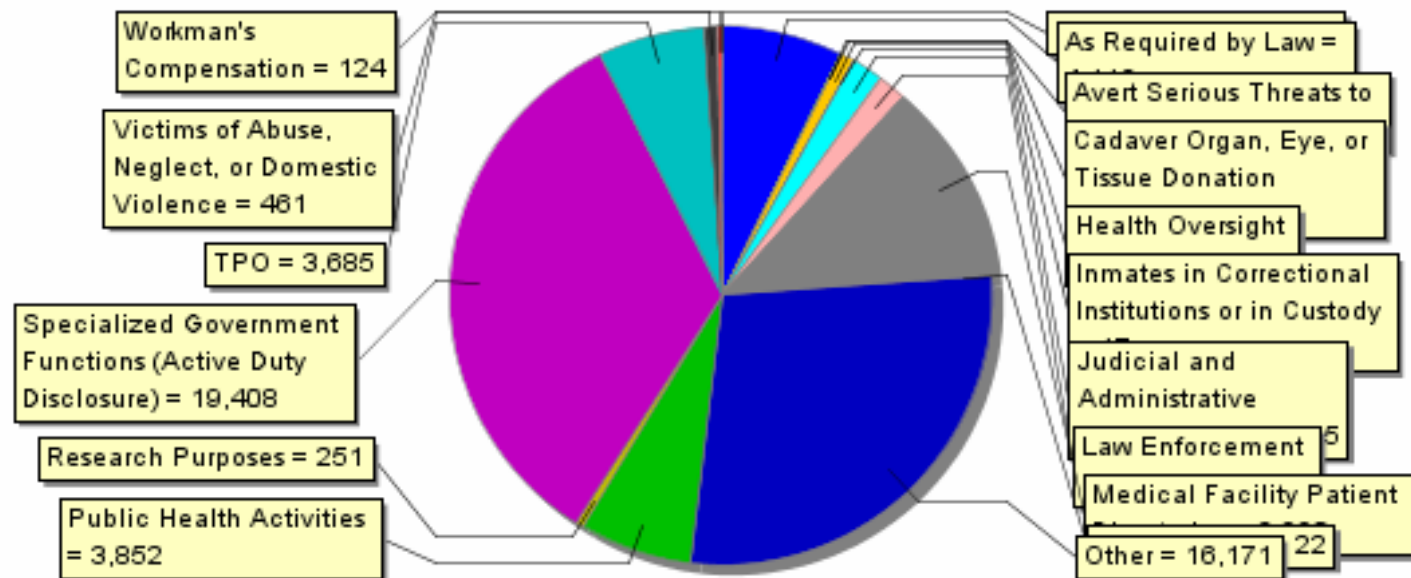
PHIMT Reports

- Privacy Specific Reports - PHIMT Reports
 - Accountings provided to beneficiary: Provide report on # of accountings of disclosures made to the individuals
 - Disclosures documented: Provide report on # of each of the 14 permitted uses and disclosures made
 - Complaints documented: Report the number of complaints received / completed
- Report the number of restrictions received / agreed to
- Report the number of authorizations
 - Received
 - Active
 - Expired

Proposed Reporting Requirements

PHIMT Reports

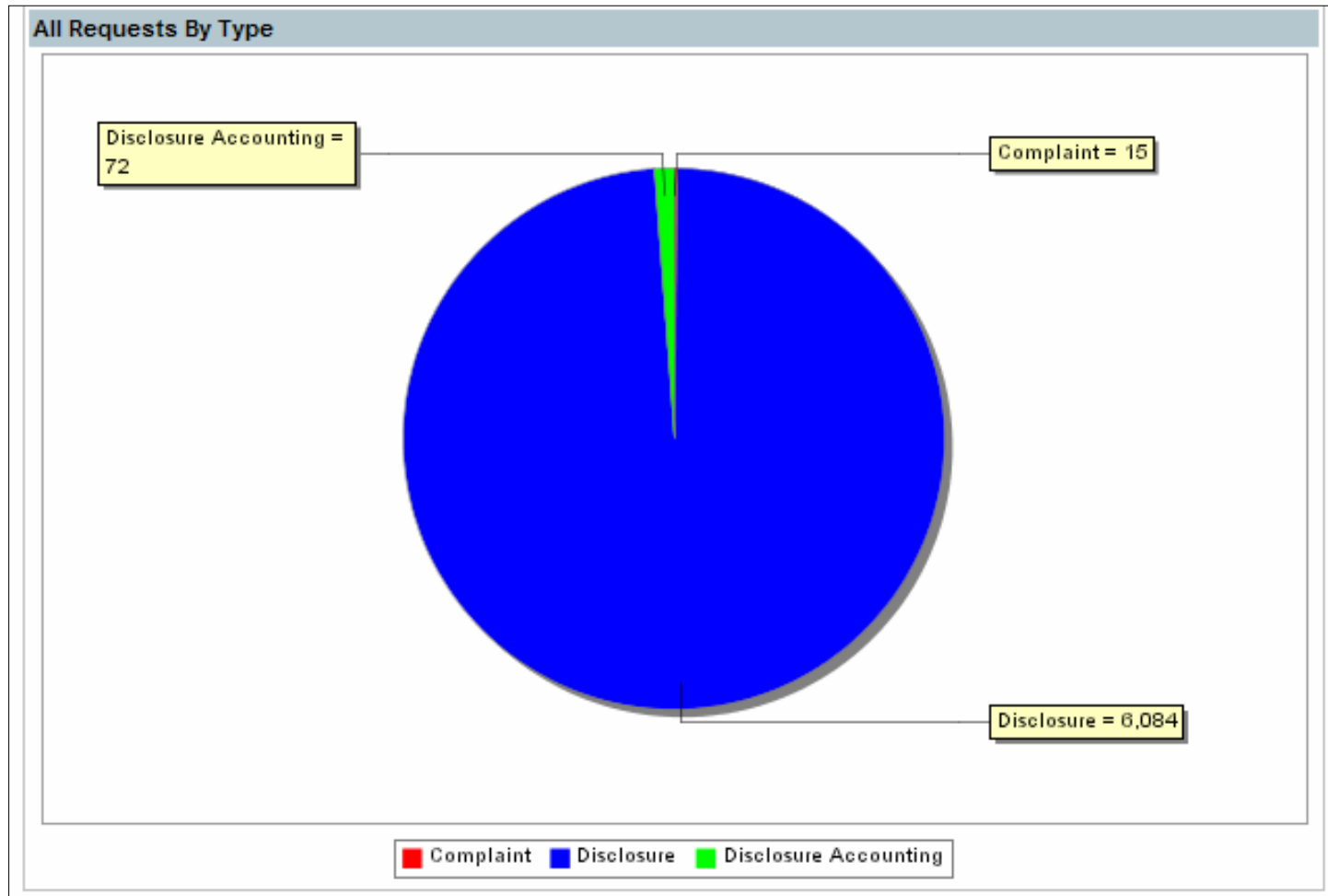
Disclosures By Type



- About Decedents
 ■ As Required by Law
 ■ Avert Serious Threats to Health or Safety
- Cadaver Organ, Eye, or Tissue Donation Purposes
 ■ Health Oversight Activities
- Inmates in Correctional Institutions or in Custody
 ■ Judicial and Administrative Proceedings
 ■ Law Enforcement Purposes
- Medical Facility Patient Directories
 ■ Not Selected
 ■ Other
 ■ Public Health Activities
 ■ Research Purposes
- Specialized Government Functions (Active Duty Disclosure)
 ■ TPO
 ■ Victims of Abuse, Neglect, or Domestic Violence
- Workman's Compensation

Proposed Reporting Requirements

Disclosure Compliance: All Requests



Proposed Reporting Requirements

Policies and Procedures Reporting

- MHS must be able to establish an initial baseline and track progress toward compliance with HIPAA Privacy and Security requirements
 - Report on the compliance of MHS HIPAA Privacy and Security at any point
 - Policy templates available on HIPAA BASICS™
- TMA Privacy Office has provided HIPAA BASICS™ to track and document compliance with HIPAA Privacy and Security Rules
- Perform gap analysis in HIPAA BASICS™
- Report # of gaps in HIPAA BASICS™ per facility
- HIPAA BASICS™ was mandated during implementation phase of the HIPAA Security program into the MHS
 - Memorandum signed August 19, 2004
 - <http://www.tricare.osd.mil/tmaprivacy/hipaa/hipaasecurity/images/pdf/Use-of-HIPAA-Basics.pdf>

Proposed Reporting Requirements

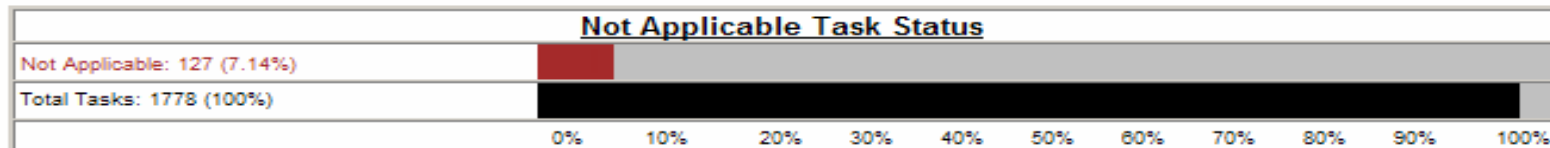
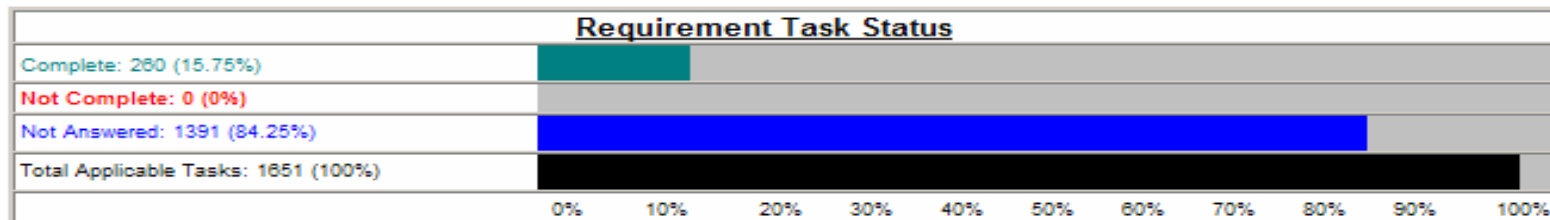
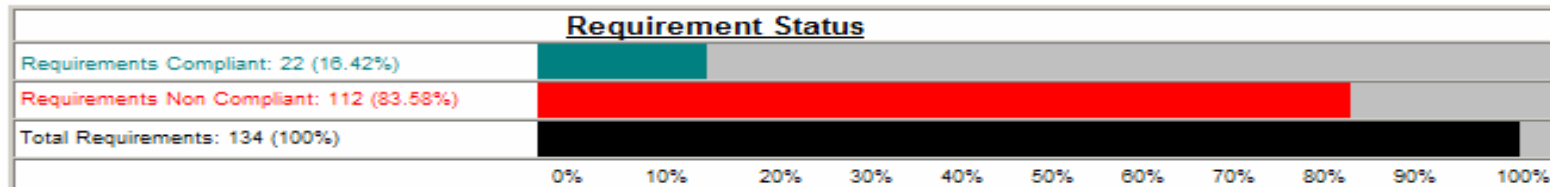
Policies and Procedures Compliance

High Level Graphical Report

Organization Name and User	Report Date	HIPAA Rule
Region A (Bob Smith)	6/15/2005	Security Standards

Reporting Organizations: MTF A; MTF B

Non-Tagged Subscriptions: none



Proposed Reporting Requirements

HIPAA Basics™ Summary Report

High Level Summary Report

Organization Name and User	Report Date	HIPAA Rule
Training (Megan McCarron)	5/25/2005	Security Standards

Gap ID: TRNG Test

Lead User: Megan McCarron

Summary Totals

	% Compliant	% Not Compliant	# Requirements	# Compliant	# Not Compliant		
Requirement Status	19.4	80.6	67	13	54		
	% Complete	% Not Complete	% Not Answered	# Tasks	# Complete	# Not Complete	# Not Answered
Requirement Task Status	18.8	0	81.2	803	151	0	652
	% Non Applicable		Total # Tasks		# Non Applicable		
Non-Applicable Task Status	9.67		889		86		

Proposed Reporting Requirements

Future Initiatives

- Reporting plan currently being drafted
- Target roll out December 2005/January 2006
- Looking for sites to beta test metrics and reporting